

**Date: November 15, 2010**

**To: Passaic River Community Advisory Group  
Elizabeth Butler; Project Manager; USEPA**

**From: Community Health and Safety Plan (CHASP) Review Committee**

**Members: James Mack  
Joseph Nardone  
Debbie Mans**

**Re: Review and General Comments  
Pre-Final Community Health and Safety Plan  
Phase 1 Removal Project  
Lower Passaic River Study Area  
Dated: October 2010**

The Passaic River Superfund Community Advisory Group CHASP Review Committee prepared a memo on April 6 2010 providing comments to the Draft CHASP. The Draft CHASP was revised and a Pre-Final CHASP has been prepared. This memo summarizes the review of the Pre-Final CHASP.

Overall, the document is very comprehensive and thorough. Covers all the relevant topics and provides clear and concise descriptions of the community health and safety issues and appropriate measures to control. Includes a map of the designated truck routes as requested in the April 6, 2010 DCHASP comment memo. However, a few of the other comments contained in that memo appear not to have been addressed.

On page 66 the UMDNJ Emergency Department is listed as the as one of the local emergency contacts. Is this the closest emergency room? There is no accompanying map showing a travel route to the UMDNJ emergency room.

A map showing the location of residences with 500 feet of the Phase 1 Work area would be useful when determining those residents most at risk from project activities. This would be helpful when estimating the potential for real community impacts. The Uplands Processing Facility is located in a portion of south Kearny that has no residences and there are no residences along the truck route from the Uplands Processing Facility to Brills Yard. Thus the most likely community impacts will be to residents near the Phase 1 work area. The map on page 9 does not label the housing areas. Additionally, an estimate of the number of trucks per day from the site would provide quantification of potential impacts.

In the April 6, 2010 memo it was recommended that outreach to local police and fire stations be performed to inform them of the project and provide updates. Local police and fire personnel should be specifically told about CHIRP because they may get involved with a response. Outreach to local police and fire is not included in the Public Participation Activities section. Tierra Solutions indicated at a CAG meeting that they were planning on meeting with local officials to brief them. Also it should be noted in the Public Participation Activities that the CHIRP will be advertised in multiple languages.

The April 6, 2010 memo recommended a truck staging area be identified, particularly with regard to the Phase 1 work area. This item is not addressed in the CHASP. There is available land area near the Phase 1 work area for truck staging. Adherence to the no-idling rule and no overnight parking on the streets except in designated areas is good, but does not address the potential for these trucks to be backing up either at the Phase 1 work area, near the processing facility or near the intermodal site where the containers will be loaded onto the train.

The discussion on the CHIRP has been expanded to include details on the initial intake of calls and the needed for the capability to handle multiple languages. These were comments on the April 6, 2010 memo that were addressed.

Tierra Solutions and EPA need to make sure the document repositories are up to date with hard copies of the materials.

On page 12, it would be helpful to provide examples of what "Environmental Media" and "Characteristic Hazardous Waste" actually is, e.g., woody debris and logs, shopping carts, sediment, etc...

Clarify whether any water pumped out of the sheet pile enclosure during high or low level water events will be treated by the wastewater treatment facility.

In the Contact Lists, the agency folks should be removed from the CAG list, as they are not really official CAG members and are already listed in the Phase I Removal Project Contacts on page 71 -- this would be USFWS, NJDEP, NOAA, and USEPA. Also, Chelsea Albucher no longer works for the City of Newark and should probably not be listed, as the interim sustainability officer is now listed.